

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA,

vs.

CRIMINAL NO. 4:05CR045

NASIR ABDUL ALI aka DONALD RAY REED

**REPLY TO GOVERNMENT' RESPONSE IN OPPOSITION TO PETITIONER'S  
MOTION FOR SENTENCE REDUCTION**

Petitioner, Nasir Abdul Ali, aka Donald Ray Reed, respectfully requests a hearing based on Petitioner's *pro se* Motion for a Reduction of Sentence [172], the Government's Response [173], and the Petitioner's *pro se* Traverse Motion/Rebuttal to Government's Response [174].

**Procedural History and First Step Act**

The Government's case history is incorporated into this Motion and accurately reflects the procedural history in this case. *See* Gov Response. § 1. Likewise, the Government agrees the First Step Act is applicable in Mr. Abdul-Ali's case. *See* Gov. Response §§ 2 and 3.

Given Mr. Abdul Ali's eligibility, it for this Court to decide, as a matter of discretion, whether to lower his sentence. At a resentencing hearing, the defense will be able to present arguments beyond the statutory range, the guideline range, and the release date, regarding all sentencing factors relevant to 18 U.S.C. § 3553(a), and Mr. Abdul Ali will have the opportunity to speak to the Court. The government can present arguments in opposition, and the Court can fully review the merits of Mr. Abdul Ali's motion for

imposition of a reduced sentence and impose a sentence that is appropriate for this individual case, now that Congress has provided sentencing courts with authority to remedy the inequities that were in the crack-cocaine statutes before 2010.

As of this filing, Mr. Abdul-Ali has been contacted and asked to send in a progress report from the Bureau of Prisons, any certifications, any courses completed, and any other documentation that would give this Court an idea of how he has adapted and bettered himself while spending the last fourteen years in prison<sup>1</sup>.

### **CONCLUSION**

Mr. Abdul Ali respectfully asks the Court to exercise its discretion and set this case for a resentencing hearing and ultimately to impose a reduced prison sentence as Mr. Abdul Ali's Guidelines range would decrease from mandatory life to 360 months to life.

Dated this 7th day of August, 2019.

Respectfully submitted,

NASIR ABDUL ALI  
aka DONALD RAY REED

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<sup>1</sup> See docket - Arrested 3/28/2005.